

BRZ Consulting, LLC (James Bearzi)

See attached Request for Extension of Time for Public Comment Period.



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via email to: hanford@ecy.wa.gov

September 5, 2025

Diana McFadden
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354

**RE: REQUEST FOR EXTENSION OF TIME
PUBLIC COMMENT PERIOD ON HIGH-LEVEL WASTE VITRIFICATION FACILITY
AGENCY-INITIATED PERMIT MODIFICATION
HANFORD SITE, WASHINGTON**

Dear Ms. McFadden:

On August 27, 2025, the public received notice ("Notice") from the Washington State Department of Ecology ("Ecology") of the Public Comment Period for an agency-initiated Permit Modification ("PM") to address certain aspects of the High-Level Waste Vitrification Facility at the Hanford Site, Washington. The Public Comment Period runs from August 27 through October 13, 2025.

The Administrative Record ("AR") for a series of documents whose underpinnings are as complex as the proposed PM for High-Level Waste Facility ("HLW Facility") and the Waste Treatment and Immobilization Plant consists of at least several dozen key documents with literally thousands of pages. While the HLW Facility has been contemplated for decades, and many components are already permitted and built, some portions that may be critical to the vitrification process are either largely defunded (e.g., the Direct Feed HLW process facility) or their details are not readily apparent in the AR documents (e.g., HLW and Low-Level Waste separation; waste characterization). Understanding the technical basis of the processes required to safely and effectively complete the vitrification process, which technologies required for the process exist now and which are aspirational, and how the milestones discussed in the PMR fit into existing Tri-Party Agreement milestones are crucial issues that must be thoroughly examined for any member of the public, non-governmental organization, government entity, or tribe to be able to make thoughtful and substantive comment.

Moreover, as I have previously corresponded with the Tri-Party Agencies concerning the public comment period on a Draft Supplement Analysis for the West Area Tank Treatment Mission and the Proposed Plan for remediation of the 324 Building, tribes and government entities are

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particularly challenged to meet even a 45-day comment period deadline. These entities, like members of the public, must first develop technical comments, which is no small task for complex sites like Hanford. Then they must take additional steps, first by submitting draft comments to their governing bodies for deliberation, all the while complying with their own public notice and open government requirements. After meeting, often in open session, staff must make any changes requested by the elected and appointed officials. Only then can the organization submit comments that codify their thoughts on the matter at hand. As you can see, this process must almost always take at least 60 to 90 days.

I believe Ecology desires thoughtful and substantive comment in all its dealings with the public, whether required by regulations and statute or not. In acknowledgement of this core value and for the reasons outlined above, I request a 60-day extension of the Public Comment Period (until December 12, 2025) to submit comments on the PMR.

While reserving my right to provide technical comment later, please also consider this letter public comment on the Proposed Plan. I look forward to your favorable consideration and approval of my request. Please contact me if you have any questions or concerns.

Sincerely,



James P. Bearzi
Principal
BRZ Consulting, LLC